## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF VIRGINIA

IN RE:	)	
	)	
TOMMY DEWAYNE DOBSON, and	)	Chapter 11
ANNE CHRISTINE DOBSON,	)	Case No. 23-60148
	)	
Debtors.	)	

# DEBTORS' AMENDED LISTS OF POTENTIAL WITNESSES AND EXHIBITS FOR THE CONFIRMATION HEARING SCHEDULED DECEMBER 11, 2023

COME NOW, Tommy Dewayne Dobson and Anne Christine Dobson, the above-captioned debtors and debtors-in-possession (the "<u>Debtors</u>"), to offer unto the Court this, their lists of potential exhibits and witnesses for the hearing on confirmation of their Second Amended Plan currently scheduled for December 11, 2023, at 9:30 a.m. (the "Confirmation Hearing"), and in support state as follows.

The Debtors state that they may offer as evidence any exhibit that has or may been filed by the United States Trustee ("UST") (Dkt No. 169), or any amendment thereto; that has or may be filed by Terry Lynn ("Lynn") (Dkt No. 175), or any amendment thereto; or that may otherwise be offered into evidence by the UST, Lynn or any other party at the Confirmation Hearing. In addition, the Debtors may offer as evidence the following exhibits.

### **Potential Exhibits**

Debtors'	Description
Exhibit No.	
1	Atlantic Union Bank Class 2 Ballot Accepting Plan
2	Certificate of Completion – Virginia Contractor Pre-License Course 8 Hours
3	DPOR Test Results
4	Home Appraisal dated March 18, 2020
5	Amended Summary of Ballots
6	DPOR License issued to Corner Stone Foundations and Excavating LLC
7	September 2023 Monthly Operating Report
8	October 2023 Monthly Operating Report
9	November 2023 Monthly Operating Report

Notwithstanding the forgoing, the Debtors reserve the right to offer into evidence any appropriate exhibit in their defense subject to the Court's approval and admission of the same.

The Debtors may call as potential witnesses the following.

#### **Potential Witnesses**

- Tommy D. Dobson
- Anne C. Dobson
- William E. Callahan, Jr.
- Samuel D. Craig, III
- Any witness called by the United States Trustee or Terry Lynn
- Any party in interest attending the hearing

Notwithstanding the forgoing, the Debtors reserve the right to call as a witness in their defense subject to the Court's approval and allowance of the same.

December 6, 2023

TOMMY DEWAYNE DOBSON <u>ANNE CHRISTINE DOBSON</u> By Counsel

/s/ David Cox David Cox, (VSB #38670) david@coxlawgroup.com COX LAW GROUP, PLLC 900 Lakeside Drive, Lynchburg, Virginia 24501 434/845/2600 434/845/0727 (Facsimile)

Counsel for the Debtors and Debtors in Possession

#### CERTIFICATE OF SERVICE

I certify that on December 6, 2023, I electronically filed the foregoing pleading with the United States Bankruptcy Court for the Western District of Virginia, causing a copy to be served upon all parties receiving electronic notice.

/s/ David Cox